## FRIEND, HUDAK & HARRIS, LLP

ATTORNEYS AT LAW
SUITE 1450
THREE RAVINIA DRIVE
ATLANTA, GEORGIA 30346-2117

(770) 399-9500 FACSIMILE (770) 395-0000 WEB www.fh2.com

Writer's email: cgerkin@fh2.com

September 16, 2011

## Submitted VIA Electronic Comment Filing System

The Honorable Marlene H. Dortch Secretary Federal Communications Commission 445 12th Street, S.W. Suite TW-A325 Washington, DC 20554

> Re: Annual CPNI Certification EB Docket No. 06-36

Dear Secretary Dortch:

On behalf of Voicecom Telecommunications, LLC, submitted herewith is a conformed copy of Voicecom's CPNI compliance certification and accompanying statement for the calendar year 2008. Voicecom has retained the original certification in its files, and this office has retained an electronic copy of the executed certification.

Should any questions arise with respect to this matter, please communicate directly with the undersigned.

Very truly your

Charles V. Gerkin, Jr.

CVG/jh

Enclosure

# FRIEND, HUDAK & HARRIS, LLP ATTORNEYS AT LAW

The Honorable Marlene H. Dortch September 16, 2011 Page 2

cc:

Voicecom Telecommunications, LLC Best Copy and Printing, Inc. (VIA email to FCC@BCPIWEB.COM)

### Annual 47 C.F.R. § 64.2009(e) CPNI Certification

#### EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2009 covering calendar year 2008

Date filed: September 16, 2011

Name of company covered by this certification: Voicecom Telecommunications, LLC d/b/a Intelliverse

Form 499 Filer ID: 823190

Name of signatory: Daniel E. Mell

Title of signatory: Chief Financial Officer

I, Daniel E. Mell, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 et seq.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company did not take any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in calendar year 2008.

The company did not receive any customer complaints in calendar year 2008 concerning the unauthorized release of CPNI.

Signed Vell

#### **CPNI Procedures**

Voicecom Telecommunications, LLC d/b/a Intelliverse ("Voicecom") has adopted and complies with the following operating procedures to protect the confidentiality of information that relates to the quantity, technical configuration, type, destination, location, or amount of use of the telecommunications services to which its customers subscribe and information contained in bills pertaining to telecommunications services that it provides to its customers (collectively, "Customer Proprietary Network Information" or "CPNI"), and to ensure that Voicecom complies with the Federal Communications Commission's CPNI rules:

- Voicecom stores all CPNI on a secure computer network that is not accessible from the Internet.
- Voicecom does not use any CPNI for any marketing purpose.
- Voicecom does not use CPNI for any purpose other than (1) to provide the
  telecommunications service from which such information is derived, (2) to
  initiate, render, bill, and collect for such telecommunications services, and (3)
  to protect the rights or property of Voicecom, or to protect users of
  Voicecom's services and other carriers from fraudulent, abusive, or unlawful
  use of, or subscription to, such services.
- Except as provided in the immediately preceding paragraph, Voicecom does not release any CPNI to third parties for any purpose except in response to legal process.
- Voicecom does not use, disclose or permit access to CPNI to identify or track customers that call competing service providers.
- Voicecom does not release any customer's CPNI to that customer except after positive confirmation of the customer's identity.
- Voicecom provides periodic training to its employees concerning the importance of maintaining the confidentiality of its customers' CPNI and when use or disclosure of its customers' CPNI is and is not authorized.
- Voicecom employees are subject to disciplinary action, including termination in appropriate cases, for violations of Voicecom's CPNI confidentiality policy.
- Any use or release of any CPNI by any Voicecom employee requires the approval of a supervisor who is knowledgeable concerning Voicecom's CPNI policies and the requirements of the CPNI rules.
- Voicecom requires all customers to use a password to access any CPNI. All passwords are encrypted and protected from any outside or inside attack.

- Voicecom requires each customer to identify himself or herself to an
  employee of Voicecom using information previously provided by the
  customer, such as shipping address, credit card number, or answer to secret
  question in order to reset their password in the event they have forgotten their
  password. Voicecom does not reset passwords based upon readily available
  biographical information or account information.
- Voicecom keeps logs of all transactions that impact CPNI either by the customer directly using a Voicecom portal or by a Voicecom employee.